

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

TANIELLE SHURNEY,

Plaintiff,

vs.

No. CA 05-196 Erie
CIVIL ACTION
ELECTRONICALLY FILED PLEADING

**SCOTT'S ECONO INN, INC.
SCOTT'S SPLASH LAGOON, INC.**

**SEAN PIERCE, INDIVIDUALLY AND IN
HIS CAPACITY AS A TROOPER OF
THE PENNSYLVANIA STATE POLICE**

**JOHN DOE, INDIVIDUALLY AND IN
HIS CAPACITY AS THE SUPERVISOR
OF TROOPER SEAN PIERCE OF THE
PENNSYLVANIA STATE POLICE**

Defendants

**RECORD IN SUPPORT OF JOINT
MOTION FOR SUMMARY JUDGMENT**

Filed on behalf of Scott's Splash Lagoon, Inc.
and Scott's Econo Inn, Inc.

Counsel of Record for these parties:

Gary D. Bax, Esq.

MURPHY TAYLOR, L.L.C.
900 State Street, Suite 202
Erie, Pennsylvania 16501
Telephone: (814) 459-0234
Fax: (814) 456-2540
Email: G_Bax@msn.com
PA38520

Attorneys for Scott's Splash Lagoon, Inc.

Gerald J. Hutton, Esq.
BASHLINE & HUTTON
One Oliver Plaza, Suite 3500
210 Sixth Ave.
Pittsburgh, PA 15222
Telephone: (412) 434-0201
Fax: (412) 434-0521
E-mail: Gerald.Hutton@LibertyMutual.com
PA23098
Attorneys for Scott's Econo Inn, Inc.

JURY TRIAL DEMANDED

RECORD IN SUPPORT OF
JOINT MOTION FOR SUMMARY JUDGMENT

NOW COME the Defendants, Scott's Splash Lagoon, Inc. and Scott's Econo Inn, Inc., by and through their undersigned counsel, and submit the following Record in Support of their Motion for Summary Judgment as follows:

1. Deposition Transcript of Tonya Traylor;
2. Deposition Transcript of Streetsboro, Ohio Police Officer Jon Hurley;
3. Deposition Transcript of Pennsylvania State Police Trooper Sean Pierce;
4. Deposition Transcript of Splash Lagoon reservation manager Patricia Purchase;
5. Plaintiff's Answers to Scott's Splash Lagoon, Inc.'s Request for Admissions;
6. Subpoena and document response from Erie County Assistant Prison Warden Senyo.
7. Plaintiff's Answers to Scott's Splash Lagoon's Interrogatories; and
8. Plaintiff's Answers to Scott's Econo Inn, Inc.'s Interrogatories.

Respectfully submitted,

MURPHY TAYLOR, L.L.C.

By: "s/"Gary D. Bax, Esq. _____

Gary D. Bax, Esq.

900 State Street, Suite 202

Erie, Pennsylvania 16501

Telephone: (814) 459-0234

Fax: (814) 456-2540

Email: G_Bax@msn.com

PA38520

Attorneys for Scott's Splash Lagoon, Inc.

BASHLINE & HUTTON

By: "s/" Gerald J. Hutton, Esq.

Gerald J. Hutton, Esq.

One Oliver Plaza, Suite 3500

210 Sixth Ave.

Pittsburgh, PA 15222

Telephone: (412) 434-0201

Fax: (412) 434-0521

E-mail: Gerald.Hutton@LibertyMutual.com

PA23098

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Defendants

CERTIFICATE OF SERVICE

Filed on behalf of Scott's Splash Lagoon, Inc.

Counsel of Record for these parties:

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JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Record in Support of Joint Motion for Summary Judgment was electronically served upon all counsel of record, this the 28th day of March, 2006:

Respectfully submitted,

MURPHY TAYLOR, L.L.C.

By: "s/"Gary D. Bax, Esq. _____

Gary D. Bax, Esq.

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Erie, Pennsylvania 16501

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Email: G_Bax@msn.com

PA38520

Attorneys for Scott's Splash Lagoon, Inc.